

From: Dale Harber <dharber@fs.fed.us>
To: <jimdsmith@utah.gov>
Date: 5/4/2005 6:07:52 PM
Subject: Subject: New Surface Facilities in Rilda Canyon, PacifiCorp, Deer Creek Mine, C/015/0018, Task ID #2195, Outgoing File

Jim:

Here are my comments on the Rilda Canyon proposal. Call me if you have any questions.

Dale

(See attached file: rilda_cyn_comments_05_04_2005.doc)

CC: <waynehedberg@utah.gov>, Dale Harber <dharber@fs.fed.us>

Subject: New Surface Facilities in Rilda Canyon, PacifiCorp, Deer Creek Mine, C/015/0018, Task ID #2195, Outgoing File

The following are Forest Service comments on PacifiCorp's revised application:

R645-301-200 Soils Section, page 24, R645-302-212.410 Evaluate the effectiveness of the experimental practice.

There is no discussion of how PacifiCorp proposes to evaluate the effectiveness of this experimental practice. They discuss where they have used this practice in the past, but not how they intend to show that it is effective at this site.

R645-301-200 Soils Section, page 25, R645-302-214.200.

One of the factors that may affect revegetation is soil compaction. The original soil may be compacted while it is covered by other soil. There should be a discussion of what compaction, if any, may be expected, how compaction may affect revegetation, and what mitigation is possible.

There should also be a description of soil compaction under the proposed facilities and how it may be mitigated at the time of final reclamation.

R645-301-200 Soils Section, page 27, R645-302-216.

This section requires a "periodic monitoring, recording, and reporting program" for the experimental practice. There is still no discussion of monitoring or reporting.

R645-301-200 Soils Section, Plan for Experimental Practice: In-Place Topsoil Storage, page 32.

Subsoil/construction Fill – Experimental Practice, first paragraph.

Describe the potential remediation methods. State that the Surface Management Agency must consent to the type of remediation to ensure that post-mining land use objectives are met.

Subsoil/construction Fill – Experimental Practice, second paragraph.

Explain how the microrhizomes will be restored in the topsoil after it has been buried for many years.

R645-301-200 Soils Section, Plan for Experimental Practice: Reclamation of the Experimental Practice Area, page 35.

This section should discuss how PacifiCorp proposes to deal with topsoil compaction and restoration of the microrhizomes.

R645-301-203 Biology Section, R645-301-341 Revegetation

Page 22, Table 300-8, Seed Mixture (Pinyon-Juniper/Mountain Brush)

Make the following changes:

Change the seeding rate for Bluebunch Wheatgrass to 2.0 lbs./acre.

Replace Big Bluegrass with Sandberg Bluegrass, *Poa secunda*, at a seeding rate of 1.0 lb./acre.

Change the seeding rate for Indian Ricegrass to 1.0 lbs./acre.

Delete Thickspike Wheatgrass.

Change the seeding rate for Blueleaf Aster to 0.25 lbs./acre.

Change the seeding rate for Blue Flax to 0.25 lbs./acre.

Replace Big Sagebrush with Snowberry, *Symphoricarpus oneophilus*, at a seeding rate of 0.5 lbs./acre.

Change the seeding rate for Curlleaf Mahogany to 1.0 lb./acre.

Change the seeding rate for Fourwing Saltbrush to 2.0 lbs./acre.

Replace the Utah Juniper, Rocky Mountain Juniper, and Pinyon Pine seedlings with True Mountain Mahogany, *Cercocarpus montanus*, at a seeding rate of 1.0 lbs./acre.

Note: The seed for Blueleaf Aster and Louisiana Sage may not be available. If a substitute is necessary, contact the Forest Service botanist, Bob Thompson, to discuss suitable replacements.

Page 23, Table 300-9, Seed Mixture (Sagebrush/Grass)

Make the following changes:

Delete Thickspike Wheatgrass.

Replace Big Sagebrush with Bitterbrush, *Purshia tridentate*, at a seeding rate of 1.0 lbs./acre.

Note: The seed for Blueleaf Aster and Louisiana Sage may not be available. If a substitute is necessary, contact the Forest Service botanist, Bob Thompson, to discuss suitable replacements.

Page 24, Table 300-10, Seed Mixture (White Fir/Aspen)

Make the following changes:

Correct the scientific name for Kentucky Bluegrass to *Poa pretenses*.

Replace Big Sagebrush with Snowberry, *Symphoricarpos oreophilius*, at a seeding rate of 1.0 lbs./acre.

Change the seeding rates for Saskatoon Serviceberry and Skunkbrush Sumac to 0.5 lbs./acre each.

Note: The seed for Louisiana Sage, Pacific Aster, and Rocky Mountain Penstemon may not be available. If a substitute is necessary, contact the Forest Service botanist, Bob Thompson, to discuss suitable replacements.

R645-301-203 Biology Section, R645-301-350, Performance Standards, page 27, 5th paragraph.

The standard for successful revegetation should also state that not more than 10% weeds are allowed and no noxious weeds are allowed.

R645-301-500, Engineering Section, R645-301-527, Transportation facilities, page 36, discussion of Emery County Road #306

The discussion states that no salt will be used within the disturbed area of the Rilda Canyon Portal Facilities. The discussion should state what will be used on the county road below the portal facilities, as this has the potential to impact Rilda Creek.

R645-301-700, Hydrology Section, page 48, Mitigation and Control Plans, 2nd paragraph.

This discussion should describe the impacts of road salt on surface water.